

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE, 2011

DOCKET NO. N2011-1

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL
SERVICE [DBP/USPS-33 through 35]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatories pursuant to the Commission's Rules of Practice and Procedure. Any reference to testimony or other sources should indicate the page and line numbers. The instructions contained in the interrogatories DFC/USPS-T1-1-6 in Docket MC2006-7 dated February 23, 2007, are incorporated herein by reference. I am available for informal discussion to respond to your request to "clarify questions and to identify portions of discovery requests considered overbroad or burdensome."

August 15, 2011

Respectfully submitted,

N20111E33

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

DBP/USPS-33 [a] Please confirm, or explain if you are unable to confirm, that the distances between facilities used in determining whether or not to evaluate a given facility for discontinuance or consolidation is based on geographic coordination distances, rather than driving distances.

[b] Please confirm, or explain if you are unable to confirm, that this geographic coordination distance is also known as "airline distance" or "as the crow flies" and will always be less than or equal to the actual driving distance.

[c] Please confirm, or explain if you are unable to confirm, that the actual driving takes into account the roads that exist and may be considerably more than the airline distance in the event of the existence of rivers or other bodies of water as well as other land features such as mountains between the two facilities.

[d] Please confirm, or explain if you are unable to confirm, that the travel time for a given distance may be greater than expected in the event of poor road conditions and/or heavy traffic.

DBP/USPS-34 Assume the following scenario. Facilities A and B are located 5 miles apart with Facility A being due east of Facility B. Furthermore assume that a given customer of Facility A is 5 miles due east of Facility A and also assume that 5 miles is the longest distance that a customer should have to drive to obtain postal services. Please confirm, or explain if you are unable to confirm, that in the event that Facility A is discontinued or consolidated and Facility B is the nearest remaining service point, this customer will have to drive twice the acceptable distance.

DBP/USPS-35 [a] Please confirm, or explain if you are unable to confirm, that for facilities with annual walk-in revenue of less than \$100,000 excludes the sale of stamp books or coils.

[b] Please confirm, or explain if you are unable to confirm, that for facilities with annual walk-in revenue of less than \$100,000 includes the sale of single stamps, multiple stamps, or sheets of stamps.

[c] Please advise the policy that applies to facilities with annual walk-in revenue of \$100,000 or more.

[d] Please advise the rationale for utilizing the items that will or will not count as a single stamp transaction.

[e] Please advise why the \$100,000 value was chosen.

[f] Please advise the number of stamps that are contained in a sheet of stamps. If less than 100% of the sheets sold have a different number of stamps, please provide a breakdown showing the percentage of each value.

[g] Please advise the number of stamps that are contained in a stamp book. If less than 100% of the books sold have a different number of stamps, please provide a breakdown showing the percentage of each value.

[h] Please define the term "sheet of stamps".

[i] Please define the term "stamp book"